

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NIKE, INC.,)	
)	
Plaintiff,)	
)	Case No. 1:23-cv-2431-VM
vs.)	
)	DECLARATION OF DONALD
BY KIY LLC,)	KELSEY REGARDING
NICKWON ARVINGER,)	DEFENDANTS' NOTICE OF
DAVID WEEKS)	DEPOSITION OF TINKER
)	HATFIELD
Defendants.)	
)	

I, Donald Kelsey, declare as follows:

1. I am a current employee of Nike, Inc. (“Nike”). In my current role at Nike, I am responsible for the Air Jordan 1 franchise. Prior to me, dating back to 2012, Jeff Atienza was responsible for the Air Jordan 1 franchise.
2. I know Tinker Hatfield. He is a high-level senior executive at Nike who reports directly to Nike’s Chief Executive Officer, John Donahoe.
3. Mr. Hatfield joined Nike in 1981 and was the company’s architect for the first five years of his career at Nike.
4. Mr. Hatfield did not start designing shoes until 1985-1986.
5. Mr. Hatfield has designed many iconic Nike footwear styles that I understand are not at issue in this case — such as the Air Jordan 3, Air Jordan 4, Air Jordan 5, Air Jordan 11, and Air Max 1. But Mr. Hatfield was not part of the design team for the Air Jordan 1.
6. From Fall 2012 through Holiday 2024, Nike released (or has plans to release) more than 1,800 colorways of the Air Jordan 1 to the global retail market.
7. Mr. Hatfield has only worked on 2-3 total variants of the Air Jordan 1, which were all within the last few years. These variants are limited to different colorways and minor aesthetic embellishments. Mr. Hatfield has never been involved in designing or altering the design of the Air Jordan 1 silhouette itself.
8. Mr. Hatfield has never been involved in market research regarding the Air Jordan 1, and Mr. Hatfield does not have knowledge of market research regarding the Air Jordan 1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 12, 2023

Donald Kelsey

Donald Kelsey